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Attorneys for Defendants Temujin Labs Inc.
 (Delaware) and Temujin Labs Inc. (Cayman)

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

ARIEL ABITTAN,

Plaintiff,

v.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
 YUTING CHEN), DAMIEN DING (A/K/A
 DAMIEN LEUNG, A/K/A TAO DING),
 TEMUJIN LABS INC. (A DELAWARE
 CORPORATION), AND TEMUJIN LABS INC.
 (A CAYMAN CORPORATION),

Defendants,

and

EIAN LABS INC.,

Nominal Defendant.

Case No.: 5:20-cv-09340-NC

**STIPULATION EXTENDING TIME
 TO RESPOND TO COMPLAINT**

(CIVIL L.R. 6-1(a))

Judge: Hon. Nathanael Cousins

Date Action Filed: December 24, 2020

Pursuant to Civil Local Rules 6-1 and 7-12, plaintiff Ariel Abittan (“Plaintiff”) and defendants Temujin Labs Inc. (Delaware) (“Temujin Delaware”) and Temujin Labs Inc. (Cayman) (“Temujin Cayman,” and together with Temujin Delaware, the “Stipulating Defendants”), by and through their respective counsel, stipulate as follows:

WHEREAS, Plaintiff commenced this action on December 24, 2020;

WHEREAS, Plaintiff purports to have properly and timely served the Stipulating Defendants and the two individual defendants;

WHEREAS, Plaintiff and the Stipulating Defendants previously agreed, pursuant to Civil L.R. 6-1(a), to extend the Stipulating Defendants’ deadline to respond to the complaint to April 6, 2021 (ECF No. 24);

WHEREAS, the parties are discussing potential simplification of issues, including the potential bifurcation of any motions challenging service of process under Rule 12(b)(5) from any substantive motions under Rule 12(b)(6) in the event the matter proceeds, subject to the approval of the Court;

WHEREAS, defendants anticipate filing motion(s) to dismiss in response to the complaint;

WHEREAS, Plaintiff disputes that any claims or defendants are subject to dismissal;

WHEREAS, the parties have met and conferred and have agreed to further extend the deadline for any defendant to respond to the complaint to April 30, 2021;

IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-1(a), that the time for any defendant to answer, move, or otherwise respond to the complaint is extended to April 30, 2021.

Dated: April 5, 2021

ALTO LITIGATION, PC

By: /s/ Bahram Seyedin-Noor
Bahram Seyedin-Noor

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Attorneys for Plaintiff Ariel Abittan

1 Dated: April 5, 2021

FENWICK & WEST LLP

2 By: /s/ Jennifer Bretan
Jennifer Bretan

3 Attorneys for Defendants Temujin Labs Inc.
4 (Delaware) and Temujin Labs Inc. (Cayman)

5 Pursuant to Civil L.R. 5-1(i)(3), all signatories concur in filing this stipulation.

6 Dated: April 6, 2021

By: /s/ Jennifer Bretan
Jennifer Bretan

FENWICK & WEST LLP
ATTORNEYS AT LAW